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United States Bankruptcy Court Eastern District of Pennsylvania

In re:	Case No. 22-12177-mdc
Angela Delores Williams,	Chapter 13
Debtor.	

Debtor's Amended Motion to Modify Chapter 13 Plan

AND NOW, Debtor Angela Delores Williams, by and through her attorney, moves this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtor states as follows:

- 1. The Debtor's plan was confirmed on January 6, 2023.
- 2. The vehicle being paid for through the current plan is not running well and needs to be replaced. The Debtor has filed a supplemental Schedule J showing monthly disposable income sufficient to pay the monthly plan payments required by the proposed plan.
- 3. The Debtor's changing financial circumstances are evidence that the Debtor can make the payments necessary under the proposed plan.
- 4. The Debtor hereby requests that the Third Amended Chapter 13 Plan filed as ECF No. 32 be approved by the court and adopted as the confirmed chapter 13 plan.

NOW, THEREFORE, the Debtor asks this Court to approve the modified plan and to grant such other relief in her favor as may be necessary and proper under the law.

Date: March 5, 2024 CIBIK LAW, P.C. Counsel for Debtor

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